

1 PHILLIP A. TALBERT  
United States Attorney  
2 KATHERINE T. LYDON  
DHRUV M. SHARMA  
3 Assistant United States Attorneys  
501 I Street, Suite 10-100  
4 Sacramento, CA 95814  
Telephone: (916) 554-2700  
5 Facsimile: (916) 554-2900

6 Attorneys for Plaintiff  
7 United States of America

8

9 IN THE UNITED STATES DISTRICT COURT

10 EASTERN DISTRICT OF CALIFORNIA

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 ROBERT POOLEY,

15 Defendant.

16 CASE NO. 2:21-CR-111 WBS

17 STIPULATION REGARDING RULE 12 BRIEFS  
DEADLINES; [PROPOSED] FINDINGS AND  
ORDER

18 DATE: March 4, 2024

TIME: 9:00 a.m.

COURT: Hon. William B. Shubb

19

20 STIPULATION

21 Plaintiff United States of America, by and through its counsel of record, and defendant, by and  
22 through defendant's counsel of record, hereby stipulate as follows:

- 23
- 24
- 25
- 26
- 27
- 28
1. The defense filed timely Rule 12 motions on February 5, 2024.
  2. By previous order, the following schedule had been set for subsequent Rule 12 briefing:
    - a) Any oppositions to Rule 12 motions were due February 19, 2024.
    - b) Any reply briefs in further support of Rule 12 motions were due by February 26, 2024.
  3. February 19, 2024 is Presidents Day, a federal holiday for which the Court is closed.
  4. The parties agree to and request that the Court order the following amended schedule:
    - a) Any oppositions to Rule 12 motions shall be filed by February 20, 2024.
    - b) Any reply briefs in further support of Rule 12 motions shall be filed by February

1 27, 2024.

2 5. The previously set dates for trial (May 14, 2024) and Trial Confirmation Hearing and  
3 Rule 12 Motions Hearing (March 4, 2024) shall remain unchanged.

4 IT IS SO STIPULATED.

5  
6 Dated: February 23, 2024

PHILLIP A. TALBERT  
United States Attorney

7 /s/ KATHERINE T. LYDON  
8 KATHERINE T. LYDON  
9 Assistant United States Attorney

10  
11 Dated: February 23, 2024

12 /s/ MIA CRAGER  
13 MIA CRAGER  
14 Counsel for Defendant  
15 ROBERT POOLEY

16 [PROPOSED] ORDER

17 IT IS SO FOUND AND ORDERED this \_\_\_\_ day of \_\_\_\_\_, \_\_\_\_\_.  
18

19 \_\_\_\_\_  
20 THE HONORABLE William B. Shubb  
21 SENIOR UNITED STATES DISTRICT JUDGE  
22  
23  
24  
25  
26  
27  
28